

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION**

Sidney Jones and Crystal Williams,)
)
*On Behalf of Themselves and All)
Other Similarly Situated Individuals,*)
)
Plaintiffs,)
)
v.)
)
Shaum's Casablanca d/b/a Lady Godivas /)
Casablanca,)
)
Defendant.)
)

**PLAINTIFFS' MOTION FOR NOTICE TO POTENTIAL PLAINTIFFS
AND FOR CONDITIONAL CERTIFICATION**

COME NOW Plaintiffs Sidney Jones and Crystal Williams (“Plaintiffs”), on behalf of themselves and other similarly situated individuals, through their undersigned attorneys, and move this Honorable Court for the following relief:

1. An Order conditionally certifying Plaintiffs' Proposed FLSA Collective Action Class pursuant to FLSA Section 216(b), to include all individuals that worked or performed as exotic dancers at or in the Lady Godivas / Casablanca Gentlemen's Club during the period August 2019 through the present ("the FLSA Class Members);
2. An Order that within fourteen (14) days of this Order, Defendant shall produce to Plaintiffs' counsel, in a usable electronic format, identifiers for all FLSA Class Members including each individual's (i) full legal name; (ii) mailing address; (iii) cellular telephone number; and (iv) email address;
3. An Order that within fourteen (14) days of Plaintiffs' counsel's receipt of the FLSA

Class Member identifiers from Defendant, Plaintiffs' counsel (or a third-party administrator) shall serve a copy of the Court Approved Notice and the Court Approved FLSA Opt-In Consent Form on each FLSA Class Member by (i) first class mail; (ii) text message; and (iii) email;

4. An Order that each FLSA Class Member shall be permitted sixty (60) days from the date Plaintiffs' counsel's service of the Notice and FLSA Opt-In Consent Form to file her FLSA Opt-In Consent Form with the Court to join this action as an FLSA Opt-In Plaintiff;
5. An Order that no earlier than thirty (30) days after the date of Plaintiffs' counsel's service of the Notice and FLSA Opt-In Consent Form, Plaintiffs' counsel (or a third party administrator) may serve the same Notice and FLSA Opt-In Consent Form each FLSA Class Member that has not yet opted-in to this action by (i) first class mail; (ii) text message; and (iii) email as a reminder notice; and
6. An Order that during the sixty (60) day opt-in period, Defendant shall post copies of the Notice and FLSA Opt-In Consent Form in a highly visible location inside the dressing room (or location where exotic dancers change clothes prior to and/or after their shift) at the Lady Godivas / Casablanca Gentlemen's Club.

In support of their motion, Plaintiffs rely upon the accompanying Memorandum of Law, the exhibits attached thereto, any Reply submission by Plaintiffs, and any hearing on Plaintiffs' Motion conducted by the Court.

Respectfully submitted,

HORTON LAW FIRM, P.A.

Dated: August 31, 2022

/s/ Jeremy R. Summerlin

Jeremy R. Summerlin

Fed. Bar No. 11827

jsummerlin@hortonlawfirm.net

307 Pettigru Street

Greenville, South Carolina 29601

(864) 233-4351 (ph)

(864) 233-7142 (fax)

Local Counsel for Plaintiffs and the Collective

ZIPIN, AMSTER & GREENBERG, LLC

Gregg C. Greenberg, MD Fed Bar No. 17291

(Admitted Pro Hac Vice)

ggreenberg@zagfirm.com

8757 Georgia Avenue, Suite 400

Silver Spring, Maryland 20910

(301) 587-9373 (ph)

Lead Counsel for Plaintiffs and the Collective